

EXHIBIT G

Lisa F. Laux, PhD - 4/15/2019

<p style="text-align: right;">1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA</p> <p>-----</p> <p>RYSTA LEONA SUSMAN, both) Case No. 8:18-cv-00127 individually and as Legal) Guardian of SHANE ALLEN) LOVELAND, et al.,) Plaintiffs,) vs.) THE GOODYEAR TIRE &) RUBBER COMPANY,) Defendant.)</p> <p>-----</p> <p>DEPOSITION OF LILA F. LAUX, Ph.D. April 15, 2019</p> <p>-----</p> <p>APPEARANCES:</p> <p style="padding-left: 40px;">KASTER, LYNCH, FARRAR & BALL, LLP By Kyle W. Farrar, Esq. 1010 Lamar Street Suite 1600 Houston, Texas 77002 Appearing on behalf of Plaintiffs.</p> <p style="padding-left: 40px;">GREENSFELDER, HEMKER & GALE, P.C. By Edward S. Bott, Jr., Esq. 10 South Broadway Suite 2000 St. Louis, Missouri 63102 Appearing on behalf of Defendant.</p>	<p style="text-align: right;">3</p> <p style="text-align: center;">I N D E X (Continued)</p> <table border="0"> <tr> <td style="text-align: left;">2 EXHIBITS</td> <td style="text-align: right;">INITIAL REFERENCE</td> </tr> <tr> <td>3 Exhibit 1 3-13-19 Laux Report</td> <td style="text-align: right;">5</td> </tr> <tr> <td>4 Exhibit 2 Laux Testimony List</td> <td style="text-align: right;">5</td> </tr> <tr> <td>5 Exhibit 3 Laux C.V.</td> <td style="text-align: right;">5</td> </tr> <tr> <td>6 Exhibit 4 Laux Fee Schedules</td> <td style="text-align: right;">6</td> </tr> <tr> <td>7 Exhibit 5 3-13-19 Laux Invoice</td> <td style="text-align: right;">6</td> </tr> <tr> <td>8 Exhibit 6 Thumb Drive - *Retained by Mr. Bott*</td> <td style="text-align: right;">7</td> </tr> <tr> <td>9</td> <td></td> </tr> <tr> <td>Exhibit 7 Deposition Notice</td> <td style="text-align: right;">42</td> </tr> <tr> <td>10</td> <td></td> </tr> <tr> <td>Exhibit 8 Michelin Technical Bulletin</td> <td style="text-align: right;">50</td> </tr> <tr> <td>11</td> <td></td> </tr> <tr> <td>Exhibit 9 Continental Product Service Information Bulletin</td> <td style="text-align: right;">50</td> </tr> <tr> <td>12</td> <td></td> </tr> <tr> <td>Exhibit 10 Cooper Service Bulletin</td> <td style="text-align: right;">50</td> </tr> <tr> <td>13</td> <td></td> </tr> <tr> <td>Exhibit 11 Laux Testimony List</td> <td style="text-align: right;">115</td> </tr> <tr> <td>14</td> <td></td> </tr> <tr> <td>15</td> <td></td> </tr> <tr> <td>16</td> <td></td> </tr> <tr> <td>17</td> <td></td> </tr> <tr> <td>18</td> <td></td> </tr> <tr> <td>19</td> <td></td> </tr> <tr> <td>20</td> <td></td> </tr> <tr> <td>21</td> <td></td> </tr> <tr> <td>22</td> <td></td> </tr> <tr> <td>23</td> <td></td> </tr> <tr> <td>24</td> <td></td> </tr> <tr> <td>25</td> <td></td> </tr> </table>	2 EXHIBITS	INITIAL REFERENCE	3 Exhibit 1 3-13-19 Laux Report	5	4 Exhibit 2 Laux Testimony List	5	5 Exhibit 3 Laux C.V.	5	6 Exhibit 4 Laux Fee Schedules	6	7 Exhibit 5 3-13-19 Laux Invoice	6	8 Exhibit 6 Thumb Drive - *Retained by Mr. Bott*	7	9		Exhibit 7 Deposition Notice	42	10		Exhibit 8 Michelin Technical Bulletin	50	11		Exhibit 9 Continental Product Service Information Bulletin	50	12		Exhibit 10 Cooper Service Bulletin	50	13		Exhibit 11 Laux Testimony List	115	14		15		16		17		18		19		20		21		22		23		24		25	
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<p style="text-align: right;">2</p> <p>1 Pursuant to Notice and the Federal Rules of 2 Civil Procedure, the deposition of LILA F. LAUX, 3 Ph.D., called by Defendant, was taken on Monday, 4 April 15, 2019, commencing at 1:00 p.m., at 216-16th 5 Street, Suite 600, Denver, Colorado, before Patricia 6 M. Wrede, Registered Professional Reporter and Notary 7 Public within and for the State of Colorado.</p> <p>8</p> <p>9 I N D E X</p> <p>10 DEPOSITION OF LILA F. LAUX, Ph.D.</p> <table border="0"> <tr> <td>11 EXAMINATION BY:</td> <td style="text-align: right;">PAGE</td> </tr> <tr> <td>12 Mr. Farrar</td> <td style="text-align: right;">--</td> </tr> <tr> <td>13 Mr. Bott</td> <td style="text-align: right;">4</td> </tr> <tr> <td>14</td> <td></td> </tr> <tr> <td>15</td> <td></td> </tr> <tr> <td>16</td> <td></td> </tr> <tr> <td>17</td> <td></td> </tr> <tr> <td>18</td> <td></td> </tr> <tr> <td>19</td> <td></td> </tr> <tr> <td>20</td> <td></td> </tr> <tr> <td>21</td> <td></td> </tr> <tr> <td>22</td> <td></td> </tr> <tr> <td>23</td> <td></td> </tr> <tr> <td>24</td> <td></td> </tr> <tr> <td>25</td> <td></td> </tr> </table>	11 EXAMINATION BY:	PAGE	12 Mr. Farrar	--	13 Mr. Bott	4	14		15		16		17		18		19		20		21		22		23		24		25		<p style="text-align: right;">4</p> <p style="text-align: center;">P R O C E E D I N G S</p> <p>(Exhibits 1 through 6 marked.)</p> <p style="text-align: center;">LILA F. LAUX, Ph.D.,</p> <p>4 being first duly sworn in the above cause, was 5 examined and testified on oath as follows:</p> <p style="text-align: center;">E X A M I N A T I O N</p> <p>7 BY MR. BOTT:</p> <p>8 Q Would you tell me your full name, please?</p> <p>9 A My full name is Lila Carol Fitzgerald</p> <p>10 Laux.</p> <p>11 Q And, Doctor -- I call you Doctor. You 12 hold a Ph.D., correct?</p> <p>13 A I do.</p> <p>14 Q Do you prefer to be referred to as Doctor 15 or Ms. or --</p> <p>16 A Well, in professional settings I'm usually 17 Doctor.</p> <p>18 Q All right. Would this be a professional 19 setting then?</p> <p>20 A I think so.</p> <p>21 Q All right then.</p> <p>22 Dr. Laux, my name is Ed Bott. We have not 23 met before today, but I represent the Goodyear Tire & 24 Rubber Company, and I'm going to be asking you 25 various questions regarding your involvement in this</p>																												
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<p style="text-align: right;">49</p> <p>1 This one says Passat and this one says</p> <p>2 Jetta.</p> <p>3 Q So is the Jetta owner's manual referenced</p> <p>4 on Exhibit 6?</p> <p>5 A Evidently not.</p> <p>6 Q Is there a reason why you didn't produce</p> <p>7 that to me?</p> <p>8 A Human error on my part. Sorry.</p> <p>9 Q With regard to your opinion 5, do you hold</p> <p>10 an opinion that in fact Goodyear should have issued a</p> <p>11 public service bulletin as you describe in opinion 5</p> <p>12 in the year 1990?</p> <p>13 A Well, it's a product service bulletin, not</p> <p>14 a public service bulletin.</p> <p>15 Q Thank you.</p> <p>16 A And do I think they could have? Yes. Do</p> <p>17 I think they should have? I don't think so, no.</p> <p>18 Q All right. Do you think that Goodyear</p> <p>19 should have provided a product service bulletin as</p> <p>20 the kind you describe in 1995?</p> <p>21 A I'm not sure when all the -- this one's</p> <p>22 from Goodyear that was a product bulletin in 2006 in</p> <p>23 which they said they didn't believe they needed to do</p> <p>24 anything about the old tires if I recall.</p> <p>25 Q So would you agree then that you're not</p>	<p style="text-align: right;">51</p> <p>1 February 2006, correct?</p> <p>2 A It is.</p> <p>3 Q Exhibit 10 is Cooper, and I don't see a</p> <p>4 date on the Cooper document. Do you happen to know?</p> <p>5 A Let me see if I have it. Mine says 2006,</p> <p>6 Light Truck and Full-Size Spare Tire Service</p> <p>7 Bulletin. It says 2006 in the reference. Service</p> <p>8 Life for Passenger Car, Light Truck and Full-Size</p> <p>9 Spare Tires. Yes.</p> <p>10 Q Okay. So the product service bulletins</p> <p>11 that you're aware of from other manufacturers would</p> <p>12 be these three that we just identified?</p> <p>13 A Well, these three, and I think I have</p> <p>14 others. Let's see what else I've referenced in here.</p> <p>15 I have one from the Japan Automotive Tyre</p> <p>16 Manufacturers Association, Cooper, Michelin,</p> <p>17 Continental, Cooper, Firestone, and then over here,</p> <p>18 this is Cooper too.</p> <p>19 So these are the ones I referenced, yes.</p> <p>20 Q Is the Japanese reference on Exhibit 6?</p> <p>21 A It's not, and, you know, it's not properly</p> <p>22 referenced in here either. It just says Japan</p> <p>23 Automotive Tyre Manufacturers Association. So I'm</p> <p>24 not sure which one it is.</p> <p>25 Q So that would be one that I couldn't even</p>
<p style="text-align: right;">50</p> <p>1 critical of Goodyear for not issuing such a product</p> <p>2 service bulletin in the year 1994?</p> <p>3 A No, I'm not.</p> <p>4 Q All right. As we look at the other</p> <p>5 product service bulletins that you mention -- and I</p> <p>6 think these had been provided to me.</p> <p>7 A The Service Life for Passenger Car from</p> <p>8 Cooper, 2006?</p> <p>9 Q Yeah, I'm just going to run through --</p> <p>10 A There are some others.</p> <p>11 Q Let me mark all of these right now. We</p> <p>12 might reference them later. There's --</p> <p>13 A They're almost all 2006.</p> <p>14 Q I have three of them here.</p> <p>15 (Exhibits 8 through 10 marked.)</p> <p>16 Q (By Mr. Bott) Doctor, Exhibits 8, 9 and 10</p> <p>17 are product service bulletins or technical bulletins</p> <p>18 that were provided to me in advance of your</p> <p>19 deposition, and I believe all of these are on</p> <p>20 Exhibit 6, although I may have -- I didn't have a lot</p> <p>21 of time to compare so maybe I missed something.</p> <p>22 Exhibit 8 is from Michelin, and it's dated</p> <p>23 February 9, 2006, correct?</p> <p>24 A Yep, that's the date.</p> <p>25 Q Continental is Exhibit 9, and that's dated</p>	<p style="text-align: right;">52</p> <p>1 find if I tried to search for it.</p> <p>2 A Oh, yeah, you could.</p> <p>3 Q Well, you said -- I thought you said it's</p> <p>4 not properly referenced?</p> <p>5 A Well, it gives you the name of the Japan</p> <p>6 Automotive Tyre Manufacturers Association, and you</p> <p>7 can go in there and look for tire service bulletin</p> <p>8 and you'll find it.</p> <p>9 Q So these product service bulletins on</p> <p>10 aging were first issued evidently in 2006.</p> <p>11 A Correct.</p> <p>12 Q And so then is it your opinion that in the</p> <p>13 2006 time frame is when Goodyear should have issued a</p> <p>14 product service bulletin on the effects of tire aging</p> <p>15 like these manufacturers did?</p> <p>16 A Well, I think they should have made that</p> <p>17 information public in -- and by 2006 other tire</p> <p>18 manufacturers had made the decision to make that</p> <p>19 information public, so it would have been appropriate</p> <p>20 for Goodyear to make it available at that time as</p> <p>21 well.</p> <p>22 Q And you're aware that Goodyear has issued</p> <p>23 product service bulletins on aging and in fact did so</p> <p>24 as far back as March of 2006 --</p> <p>25 A Yes.</p>

13 (Pages 49 to 52)

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<p style="text-align: right;">73</p> <p>1 appreciate having that on their tire? Would you 2 agree with that?</p> <p>3 A I would agree that some owners might not 4 want red or white or yellow print on the sides of 5 their tires.</p> <p>6 Q And with regard to your prototype, you go 7 on to state that, "The prototype warning should be 8 validly tested with a representative user group to 9 determine whether it can be seen and read and whether 10 it is understood."</p> <p>11 You have not done that testing validation, 12 have you?</p> <p>13 A Well, I can't stamp tires, so, no, I 14 haven't.</p> <p>15 Q All right. And are you aware of anyone 16 who has undertaken that testing?</p> <p>17 A I don't think any tire manufacturer has 18 attempted to stamp this into their tire, no.</p> <p>19 Q Are you aware of anyone, even independent 20 of a tire manufacturer, who has attempted to undergo 21 this testing -- or undertake this testing?</p> <p>22 A There is no way anyone can undergo this 23 testing unless they have the capacity to stamp a 24 tire.</p> <p>25 Q Okay. So the answer is --</p>	<p style="text-align: right;">75</p> <p>1 A I certainly wish it were, but do I expect 2 that it would have been? No.</p> <p>3 Q Okay. And why is it that you expect it 4 would not have been?</p> <p>5 A Well, I think in June of 1994 there was 6 not a general consensus among all of the tire 7 manufacturers about this issue.</p> <p>8 Q And so had it not been included back in 9 June of 1994, you wouldn't have been critical of 10 Goodyear or any tire manufacturer for not putting it 11 on there because there was no recognized consensus in 12 the industry at that time.</p> <p>13 A Well, would I be critical? Would I think 14 that they probably already knew about this based on 15 the early -- wait a minute. Let me give my answer.</p> <p>16 Q I was.</p> <p>17 A No, you weren't. You were getting ready 18 to interrupt me.</p> <p>19 So, you know, this issue was already known 20 in the community as recognized by VW putting it on 21 their car, but do I -- would I be critical? I would 22 be critical of anybody who knew something about a 23 hazard and didn't tell people. Do I -- do I 24 understand why this wasn't yet placed on the tire? 25 Yes.</p>
<p style="text-align: right;">74</p> <p>1 A Has to be no, right?</p> <p>2 Q -- there is no such testing.</p> <p>3 A Of course not.</p> <p>4 Q All right. And then you state, "Once a 5 warning is in place, data should be collected on 6 accidents to determine whether the warning is being 7 effective."</p> <p>8 A That's standard.</p> <p>9 Q And this is obviously stating the obvious, 10 but there clearly is no data that you're aware of 11 that goes to the effectiveness of such a prototype 12 warning, correct?</p> <p>13 A Well, since this prototype warning hasn't 14 been stamped into any tires that I'm aware of, 15 clearly there's not.</p> <p>16 Q All right.</p> <p>17 A But that's standard practice for any 18 manufacturer, is to collect data like this to 19 determine if something is effective or not, a warning 20 is effective or not.</p> <p>21 Q And clearly, given that this relates to 22 stamping on the tire at the time of manufacture, I 23 assume it's your opinion that this prototype warning 24 should have been on this tire at the time it was 25 manufactured in June of 1994?</p>	<p style="text-align: right;">76</p> <p>1 Q Yeah, so in terms of -- and I want to 2 understand whether -- is it your opinion to a 3 reasonable degree of professional certainty that in 4 this case this tire was unsafe as manufactured in 5 June of 1994 by virtue of the fact that it did not 6 have this prototype warning on it?</p> <p>7 A Well, actually I do believe that it was 8 unsafe not to have a -- it doesn't have to be this as 9 the prototype -- not to have this information about 10 the age that they -- the tire was manufactured so 11 that people could determine how old it was, but I 12 understand that at that time tire manufacturers were 13 not warning about this issue and they were still 14 resistant to the idea, I believe, that tires aged 15 out.</p> <p>16 So am I surprised that it wasn't on there? 17 No. Do I wish it had been on there? Yes. Am I 18 critical? Well, I don't know whether I would say I'm 19 critical or not. I understand why it's not on there.</p> <p>20 Q And without going through each of them 21 individually, isn't it true that the product service 22 bulletins we identified, the NHTSA study you've 23 referenced, the Baldwin study that you've referenced, 24 and probably others, all of those relate to activity 25 that was ongoing in the mid 2000's?</p>

19 (Pages 73 to 76)

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<p style="text-align: right;">77</p> <p>1 A Yes, a lot of it was -- started in the 2 early 2000's, yes.</p> <p>3 Q And is there anything other than the 4 Volkswagen reference that you mentioned on your 5 Appendix B that predates all of that, that goes back 6 into the 1990's and deals with this issue of aging?</p> <p>7 A I bet you I didn't put it in that list, 8 but I do have a bunch of old operator's manuals, and 9 just like the old Jetta manual, many of them talk 10 about replace -- they're all European cars. All 11 European cars only. I never saw an it in an American 12 car, but I did see it in other European cars that --</p> <p>13 Q Which European cars?</p> <p>14 A I'm not sure, but I can certainly get you 15 those.</p> <p>16 Q Well, as you sit here today, can you 17 identify any owner's manual from --</p> <p>18 A BMW I think was one of them.</p> <p>19 Q BMW what year?</p> <p>20 A Well, in the early 1900's -- 1990's, but I 21 can't tell you exactly for sure which year, but, you 22 know, I did cite that one because I liked the 23 forthright way in which they talked about tires and 24 spare tires.</p> <p>25 Q Where did you cite the BMW?</p>	<p style="text-align: right;">79</p> <p>1 statement based again solely on the other references 2 that you've told me about in this deposition?</p> <p>3 Does that make sense to you what I'm 4 asking?</p> <p>5 A It does, but there's a lot of things that 6 I said it was foreseeable to Goodyear about. So, you 7 know, they talk about reasons to replace a tire, and 8 aging is not one of them, but it was foreseeable to 9 Goodyear that a tire could be 20 years old and not 10 have any of those -- that's what this statement is 11 all about -- not have any of those characteristics 12 that they say are reason to replace a tire.</p> <p>13 So they could foresee that a tire could 14 get to be 20 years old and not have any of those 15 cracks, bulges, tread worn down to a minimum depth or 16 damage caused by underinflation or overloading, but 17 that it would be 20 years old and that based on the 18 NHTSA information and the other information, Baldwin 19 and so forth, that being 20 years old alone meant 20 that it was more likely to lose tread.</p> <p>21 Q Now, do those references say that just 22 being 20 years old makes it more likely to lose 23 tread?</p> <p>24 A If you look at the -- was more likely to 25 fail, I guess I should say, and typically that</p>
<p style="text-align: right;">78</p> <p>1 A I didn't.</p> <p>2 Q Oh.</p> <p>3 A I cited this one, which is what I said 4 that I thought -- this is from a Jeep in 2013 that 5 was in the owner's manual, and I thought that was an 6 excellent warning.</p> <p>7 Q So other than the European owner's manuals 8 that you're unable to specifically identify, are you 9 aware of any study or reference or work being done 10 here in the United States in the 1990's that deals 11 with this issue? Can you cite me to any?</p> <p>12 A Well, I think what NHTSA started the study 13 in 2002.</p> <p>14 Q All right. So that would be the earliest 15 that you're aware of?</p> <p>16 A That's the earliest one that I know of in 17 the United States, yes.</p> <p>18 Q And turning then to number 8, you refer to 19 a couple of things there that in your judgment would 20 be foreseeable to Goodyear regarding a tire 20 years 21 old. And I don't need to get too deep into the weeds 22 on this. I just want to know, is there anything here 23 specifically from Goodyear, from a Goodyear witness, 24 from a Goodyear document, that leads you to conclude 25 this was foreseeable to Goodyear, or is this</p>	<p style="text-align: right;">80</p> <p>1 failure is detreading.</p> <p>2 But if you look at the graph in the NHTSA 3 reports, if you look at John Baldwin's data, sure, it 4 does say that they are more likely to fail the older 5 they get after six years old.</p> <p>6 Q Okay. But it doesn't say that they're 7 more likely to lose tread.</p> <p>8 A I don't recall whether they said that or 9 whether they just said fail.</p> <p>10 Q And is the NHTSA data on the Ford 11 Firestone tires?</p> <p>12 A No. That was one of the impetus for doing 13 it, but they did research on -- the 2002 study was on 14 tire failure, period.</p> <p>15 Q All right.</p> <p>16 A Tire failure, period.</p> <p>17 See, when they did this research report to 18 Congress in 2007 on tire aging, that was not just on 19 the Firestone tires.</p> <p>20 Q Okay. Are you aware of -- and I apologize 21 if I've asked you this, but -- and sometimes I tend 22 to jump around and I forget whether I've asked you 23 things before or not.</p> <p>24 Are you aware of any manufacturer that 25 puts the born date on their tire?</p>

20 (Pages 77 to 80)

Lisa F. Laux, PhD - 4/15/2019

<p style="text-align: right;">81</p> <p>1 A No, I'm not.</p> <p>2 Q Are you aware of any manufacturer that</p> <p>3 puts any type of a warning regarding the aging on</p> <p>4 their tire?</p> <p>5 A No. They have some warnings on their</p> <p>6 tires but not about aging.</p> <p>7 Q All right. And do we agree that NHTSA has</p> <p>8 never recommended that such a warning about aging be</p> <p>9 put on the tires, have they?</p> <p>10 A I don't think they have, no.</p> <p>11 Q And do we agree that NHTSA has never</p> <p>12 recommended that a born date be put on tires, have</p> <p>13 they?</p> <p>14 A They haven't, although they have</p> <p>15 recognized the difficulty that people have</p> <p>16 determining the manufacture date of tires based on</p> <p>17 the DOT number, but they haven't made any effort to</p> <p>18 change that.</p> <p>19 Q And do we agree that there is no federal</p> <p>20 regulation that requires placement of an age-related</p> <p>21 warning on the tires?</p> <p>22 A There's not.</p> <p>23 Q I want to ask you about number 9 if I may.</p> <p>24 A Okay.</p> <p>25 Q You say, "Goodyear's failure to adequately</p>	<p style="text-align: right;">83</p> <p>1 then when he went into Kearney's to have those tires</p> <p>2 put on his vehicle, they would have known about it,</p> <p>3 and they would have said to him, look, these tires</p> <p>4 are 20 years old, we don't want to mount these tires.</p> <p>5 Like Discount Tire won't put a tire 10 years old or</p> <p>6 even service a tire 10 years old anymore because they</p> <p>7 recognize the hazard. They're probably one of the</p> <p>8 biggest maintainers in the U.S.</p> <p>9 So if this had gotten out to places like</p> <p>10 Kearney's and other places, smaller places --</p> <p>11 Discount's a very big place. They do -- have had</p> <p>12 problems and so they recognize the issue, but</p> <p>13 someplace like Kearney needs to get the information,</p> <p>14 and this could be put out by Goodyear.</p> <p>15 Q Well, other than the product service</p> <p>16 bulletins, are you saying that there is some other</p> <p>17 means by which that should have been communicated, or</p> <p>18 is it just through the product service bulletins?</p> <p>19 A Well, it's my understanding that most tire</p> <p>20 manufacturers just send the tire service bulletins to</p> <p>21 places where their tires are bought in large</p> <p>22 quantities.</p> <p>23 Q And that's sufficient, correct, in your</p> <p>24 judgment?</p> <p>25 A Well, it would be better if they were sent</p>
<p style="text-align: right;">82</p> <p>1 warn and instruct vehicle owners and maintainers and</p> <p>2 drivers about the hazards associated with driving at</p> <p>3 highway speeds on a tire more than 10 years old</p> <p>4 created an unreasonably dangerous situation, which</p> <p>5 precipitated the injury/death accident."</p> <p>6 I take that to mean that you're talking</p> <p>7 about the accident that happened here to Mr. Loveland</p> <p>8 and Mr. Summers?</p> <p>9 A Yes. It wasn't a death, though, actually.</p> <p>10 Q Yes. And when you say "Goodyear's failure</p> <p>11 to adequately warn and instruct vehicle owners," how</p> <p>12 would in your judgment Goodyear have adequately</p> <p>13 warned and instructed vehicle owners? Would that</p> <p>14 have been through the labeling on the tire that we've</p> <p>15 talked about?</p> <p>16 A Well, that would have been one way, but of</p> <p>17 course I'm not talking about that here.</p> <p>18 Q Okay. What are you talking about here?</p> <p>19 A Well, I'm talking about the fact that if</p> <p>20 they had notified all the tire places like Kearney's</p> <p>21 and everybody who -- you know, who has -- who</p> <p>22 maintains their tires, and certainly it could have</p> <p>23 been put in the driving -- wherever people go to get</p> <p>24 their driver's licenses renewed, all those kinds of</p> <p>25 locations, to make this information widely known,</p>	<p style="text-align: right;">84</p> <p>1 out to places like Kearney's and other smaller groups</p> <p>2 of people who also deal with tires, mount and service</p> <p>3 tires, and there are plenty of them. And I recognize</p> <p>4 that, you know, locating all of them is not</p> <p>5 necessarily simple, but they are all registered with</p> <p>6 the state typically and so they can be located. So</p> <p>7 if you want to make this information public, if you</p> <p>8 want to make people aware of it, you could certainly</p> <p>9 have public service announcements on the radio and on</p> <p>10 TV.</p> <p>11 Q Well, I know you could do a lot of things.</p> <p>12 What --</p> <p>13 A Sure you could, and it's an issue that you</p> <p>14 should do because it's clearly one that the driving</p> <p>15 public is not aware of.</p> <p>16 Q Well, but, you know, Dr. Laux, I'm trying</p> <p>17 to differentiate between things that you think would</p> <p>18 be a good idea versus your opinions in this case.</p> <p>19 Okay? And so I --</p> <p>20 A My opinion is --</p> <p>21 Q So I need --</p> <p>22 MR. FARRAR: Let him finish the question.</p> <p>23 Q (By Mr. Bott) I need to understand how is</p> <p>24 it that you think Goodyear failed to provide adequate</p> <p>25 information -- or failed -- I'm sorry, failed to</p>

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